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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CRUISER SHIPPING PTE LTD. and
UNIVERSAL NAVIGATION PTE LTD.,

07 CV 4036 (JGK)

Plaintiffs

-against-

SUNDERSONS LTD., MILAN NIGERIA LTD.,
SIMRAN MEHER LTD. and VALECHHA
HOLDINGS LIMITED,

Defendants


NOTICE OF MOTION FOR COUNTERSECURITY

PLEASE TAKE NOTICE that upon the Affidavit of Thomas H. Belknap, Jr., dated November 14, 2007, Defendant's Memorandum of Law, and all prior pleadings and papers on file in this action, and pursuant to Rule E(7) of the Supplemental Rules for Certain Admiralty and Maritime Claims, Defendant Milan Nigeria Ltd., will move before the Honorable John G. Koeltl on the 7th day of December, 2007, or as soon thereafter as counsel may be heard, for an Order requiring Plaintiffs Cruiser Shipping Pte. Ltd. and Universal Navigation Pte. Ltd to provide countersecurity in the amount of \$158,472.73 to Defendant Milan in respect of its counterclaim in this matter.

PLEASE TAKE FURTHER NOTICE that Plaintiffs' response brief shall be served on or before November 30, 2007 and Defendant's reply shall be served by December 7, 2007.

Dated: New York, NY
November 15, 2007

Respectfully submitted,
BLANK ROME, LLP
Attorneys for Defendant/Counterclaim-Plaintiff
MILAN NIGERIA LIMITED

By 
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